

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Case # 2:23-cv-00117-GMN-DJA

Bianca Lang-Black

Plaintiff(s),

vs.

AAA Life Insurance Company, et al.

Defendant(s).

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

FILING FEE IS \$250.00

Kade A. Rhodes, Petitioner, respectfully represents to the Court:
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of

McDowell Hetherington LLP

(firm name)

with offices at 1000 Ballpark Way, Suite 209,
(street address)

Arlington, Texas, 76011,
(city) (state) (zip code)

817-635-7300, kade.rhodes@mhllp.com.
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by
AAA Life Insurance Company to provide legal representation in connection with
[client(s)]

the above-entitled case now pending before this Court.

3. That since November 2, 2018, Petitioner has been and presently is a
 (date)
 member in good standing of the bar of the highest Court of the State of Texas
 (state)
 where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or
 from the clerk of the supreme court or highest admitting court of each state, territory, or insular
 possession of the United States in which the applicant has been admitted to practice law certifying
 the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District
 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts
 of other States on the dates indicated for each, and that Petitioner is presently a member in good
 standing of the bars of said Courts.

Court	Date Admitted	Bar Number
U.S. District Court - Southern District of TX	10/21/2020	
U.S. District Court - Northern District of TX	07/31/2020	
U.S. District Court - Western District of TX	09/28/2020	
U.S. District Court - Eastern District of TX	08/13/2020	

5. That there are or have been no disciplinary proceedings instituted against petitioner,
 nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory
 or administrative body, or any resignation or termination in order to avoid disciplinary or
 disbarment proceedings, except as described in detail below:

None.

6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give particulars if ever denied admission):

None.

7. That Petitioner is a member of good standing in the following Bar Associations.

State Bar of Texas

8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
None			Denied
			Denied
			Denied
			Denied
			Denied

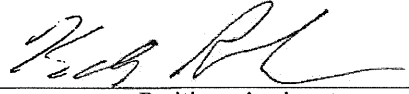
(If necessary, please attach a statement of additional applications)

9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.


11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
FOR THE PURPOSES OF THIS CASE ONLY.


Petitioner's signature

STATE OF Texas)
COUNTY OF TARRANT)

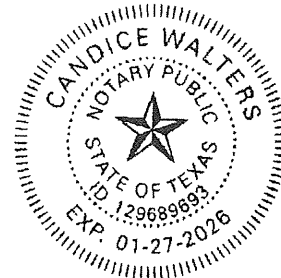
Kade A. Rhodes, Petitioner, being first duly sworn, deposes and says:
That the foregoing statements are true.


Petitioner's signature

Subscribed and sworn to before me this

16th day of June, 2025

Candice Walters
Notary Public or Clerk of Court



**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner
believes it to be in the best interests of the client(s) to designate Charles H. McCrea,
(name of local counsel)
Attorney at Law, member of the State of Nevada and previously admitted to practice before the
above-entitled Court as associate resident counsel in this action. The address and email address of
said designated Nevada counsel is:

520 South Fourth Street, Suite 320,
(street address)

Las Vegas, Nevada, 89101,
(city) (state) (zip code)

702-834-8777, chm@hmlawtv.com,
(area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.
4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**
6

7 The undersigned party(ies) appoint(s) Charles H McCrea as
8 his/her/their Designated Resident Nevada Counsel in this case.
9 (name of local counsel)

10 Jonathan Marlin
11 (party's signature)

12 AAA Life Insurance Company
13 (type or print party name, title)

14 Jonathan Marlin
15 (party's signature)

16 Jonathan Marlin, Counsel
17 (type or print party name, title)

18 **CONSENT OF DESIGNEE**

19 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.
20

21 Charles H McCrea
22 Designated Resident Nevada Counsel's signature

23 104 charles@prhlawllc.com
24 Bar number Email address

25 APPROVED:

26 Dated: this 23 day of June, 2025.

27 [Signature]
28 UNITED STATES DISTRICT JUDGE

The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

Kade A. Rhodes

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 2nd day of November, 2018.

I further certify that the records of this office show that, as of this date

Kade A. Rhodes

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my signature



and the seal of the Supreme Court of Texas at the City of Austin, this, the 11th day of June, 2025.

BLAKE HAWTHORNE, Clerk

Blake A. Hawthorne
Clerk, Supreme Court of Texas

No. 1623C.1